REMARKS

Reconsideration and allowance of the subject application are respectfully requested. Claims 1-6 remain pending, claims 1, 3, 5, and 6 being independent claims. In this Reply, Applicant has amended claims 1-6.

Prior Art Rejection

Claims 1-6 stand rejected under 35 U.S.C. § 102 as being anticipated by *Kuba et al.* (U.S. Patent 5,806,072). This rejection, insofar as it may pertain to the presently pending claims, is respectfully traversed.

Independent claim 1 is directed to an image file apparatus for reading out an image file that has been recorded on a first loadable/removable recording medium and recording this image file on a second loadable/removable recording medium. The image file apparatus of claim 1 comprises: an image file readout unit for reading out an image file that has been recorded on the first loadable and removable recording medium; a file-name duplication discrimination unit for determining whether a file name of the image file that has been read out by said image file readout unit and a file name of an image file that has been recorded on the second loadable and removable recording medium are duplicates; an image-file recording controller, which is responsive to a determination by said file-name duplication discrimination unit that the file names are duplicates, for changing the file name of the image file that has been read out of the first loadable and removable recording medium and recording this read image file on the second loadable and removable recording medium in such a manner that file names of image files that have been recorded on the second loadable and removable recording medium will not be duplicated; and a grouping unit for grouping image files, which have been recorded on the second loadable and removable recording medium by said

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image-file recording control unit, according to the types of images represented by the image files.

Independent claim 5 is directed to an image file method in an image file apparatus for reading out an image file that has been recorded on a first loadable/removable recording medium and recording this image file on a second loadable/removable recording medium. The image file method of claim 5 comprises: reading out an image file that has been recorded on the first loadable and removable recording medium; determining whether a file name of the image file that has been read out of the first loadable and removable recording medium and a file name of an image file that has been recorded on the second loadable and removable recording medium are duplicates; in response to a determination that the file names are duplicates, changing the file name of the image file that has been read out of the first loadable and removable recording medium and recording this read image file on the second loadable and removable recording medium in such a manner that file names of image files that have been recorded on the second loadable and removable recording medium will not be duplicated; and grouping image files, which have been recorded on the second loadable and removable recording medium by the image-file recording control unit, according to the types of images represented by the image files.

Thus, in accordance with the invention as defined in independent claims 1 and 5, when an image file is read out of a first loadable and removable recording medium, it is determined whether the file name of the image file that has been read out duplicates the file name of any image file that has already been recorded on a second loadable and removable recording medium. If file names are duplicates, the file name of the image file that has been read out of the first loadable/removable recording medium is changed

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so that it will not duplicate the file name of any image file that has been recorded on the second loadable/removable recording medium. The image file having a changed file name is recorded on a second loadable/removable recording medium. Since the file name of an image file read out of the first loadable/removable recording medium is changed before it is recorded on the second loadable/removable recording medium, image files having identical file names are prevented from being recorded on the second loadable/removable recording medium. Thus, since image files that have been recorded on the second loadable/removable recording medium will not be erased (i.e., overwritten), it is possible to prevent important files from being inadvertently erased from the second loadable/removable recording medium.

As shown for example in Fig. 2, *Kuba* discloses an apparatus in which digital image data representing an object image is stored in a RAM 4. When storing (i.e., recording) image data in a memory card 14, the image data is read out block by block from the RAM 4 and supplied to a compression/expansion circuit 7 for compression using an orthogonal conversion process, such as the discrete cosine transform (DCT). After compression by the compression/expansion circuit 7, the compressed image data is input to the memory card 14 via the card interface 13 and a bus to be stored in a designated area of the memory card 14. See e.g., col. 13, line 62 - col. 14, line 17.

In rejecting the original claims of this application, the Examiner relies on the RAM 4 of *Kuba* as allegedly corresponding to the first recording medium of the claims. Applicant notes, however, that the RAM 4 of *Kuba* is not a loadable/removable recording medium. Thus, the apparatus of *Kuba* does not achieve the same effect as the invention defined in independent claims 1 and 5.

For anticipation under 35 U.S.C. § 102, "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). For at least the reasons stated above, Applicant respectfully submits that all of the elements of independent claims 1 and 5 are not set forth in *Kuba* and, thus, *Kuba* fails to anticipate either claim 1 or claim 5.

Independent claim 3 is directed to an image file apparatus comprising: an image file readout unit for reading out an image file that has been recorded on a first loadable and removable recording medium; a recording controller for recording the image file, which has been read out by said image file readout unit, on a second loadable and removable recording medium; and an output unit for outputting an image file being recorded on the second loadable and removable recording medium by said recording controller.

Independent claim 6 is directed to an image file method comprising: reading out an image file that has been recorded on a first loadable and removable recording medium; recording the read image file on a second loadable and removable recording medium; and outputting an image file being recorded on the second loadable and removable recording medium.

In accordance with the invention defined by independent claims 3 and 6, an image file that has been recorded on the first loadable/removable recording medium, and the image file being recorded on the second loadable/removable recording medium is output during the recording. By supplying the image file to an output, e.g., a display unit, during recording, the image represented by the image file being recorded on the

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second loadable/removable recording medium can be verified by the user, thus enabling the user to recognize which file is being recorded on the second loadable/removable recording medium.

Again, Applicant notes that the RAM 4 of *Kuba* is neither loadable nor removable and, as such, the apparatus of *Kuba* does not achieve the effect as the present invention defined in independent claims 3 and 6. Furthermore, in *Kuba*, the image data is read out from the memory card 14, and is converted into an analog signal. The analog signal is then encoded in the video encoder to be output as a video signal. See e.g., col. 14, lines 20-31. In *Kuba*, an image file being recorded on the memory card 14 is not outputted.

At least for the above reasons, Applicant respectfully submits that all elements of independent claims 3 and 6 are not set forth in *Kuba* and, thus, *Kuba* fails to anticipate either of these claims.

At least in view of the above, *Kuba* fails to anticipate any of independent claims 1, 3, 5, and 6. Dependent claims 2 and 4 define over *Kuba* at least for depending from claims 1 and 3, respectively.

In view of the above, Applicant respectfully requests reconsideration and withdrawal of the Examiner's rejection under 35 U.S.C. § 102.
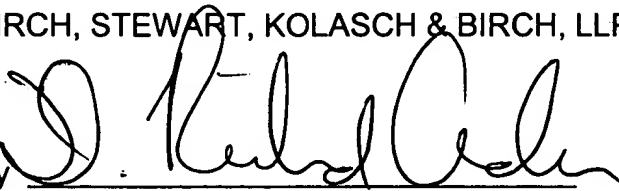
CONCLUSION

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number below to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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Attachment: Version With Markings to Show Changes Made

VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS:

The claims have been amended as follows:

1. (Amended) An image file apparatus for reading out an image file that has been recorded on a first <u>loadable and removable</u> recording medium and recording this image file on a second <u>loadable and removable</u> recording medium, comprising:

an image file readout unit for reading out an image file that has been recorded on the first <u>loadable and removable</u> recording medium;

a file-name duplication discrimination unit for determining whether a file name of the image file that has been read out by said image file readout unit and a file name of an image file that has been recorded on the second <u>loadable and removable</u> recording medium are duplicates;

an image-file recording controller, which is responsive to a determination by said file-name duplication discrimination unit that the file names are duplicates, for changing the file name of the image file that has been read out of the first <u>loadable and removable</u> recording medium and recording this read image file on the second <u>loadable and removable</u> recording medium in such a manner that file names of image files that have been recorded on the second <u>loadable and removable</u> recording medium will not be duplicated; and

a grouping unit for grouping image files, which have been recorded on the second <u>loadable and removable</u> recording medium by said image-file recording control unit, according to the types of images represented by the image files.

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2. (Amended) The apparatus according to claim 1, wherein said grouping unit causes a file name corresponding to each group to be recorded on the second <u>loadable and removable</u> recording medium.

3. (Amended) An image file apparatus comprising:

an image file readout unit for reading out an image file that has been recorded on a first <u>loadable and removable</u> recording medium;

a recording controller for recording the image file, which has been read out by said image file readout unit, on a second <u>loadable and removable</u> recording medium; and

an output unit for outputting an image file being recorded on the second <u>loadable and removable</u> recording medium by said recording controller.

4. (Amended) The apparatus according to claim 3, wherein said output unit is a display device for displaying an image represented by an image file that has been recorded on the second <u>loadable and removable</u> recording medium.

5. (Amended) An image file method in an image file apparatus for reading out an image file that has been recorded on a first <u>loadable and removable</u> recording medium and recording this image file on a second <u>loadable and removable</u> recording medium, comprising the steps of:

reading out an image file that has been recorded on the first <u>loadable and removable</u> recording medium;

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determining whether a file name of the image file that has been read out of the first <u>loadable and removable</u> recording medium and a file name of an image file that has been recorded on the second <u>loadable and removable</u> recording medium are duplicates;

in response to a determination that the file names are duplicates, changing the file name of the image file that has been read out of the first <u>loadable and removable</u> recording medium and recording this read image file on the second <u>loadable and removable</u> recording medium in such a manner that file names of image files that have been recorded on the second <u>loadable and removable</u> recording medium will not be duplicated; and

grouping image files, which have been recorded on the second <u>loadable and removable</u> recording medium by the image-file recording control unit, according to the types of images represented by the image files.

6. (Amended) An image file method comprising the steps of:

reading out an image file that has been recorded on a first <u>loadable and removable</u> recording medium;

recording the read image file on a second <u>loadable and removable</u> recording medium; and

outputting an image file being recorded on the second <u>loadable and removable</u> recording medium.